

# HANNA H. SHOSHANY, ESQ.

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**VIA ECF**

Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

January 23, 2025

Application granted. The Court approves Mr. Berger's request to modify his bail conditions. The status conference is adjourned to April 11, 2025 at 2:30 p.m. Time is excluded until April 11, 2025, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

**RE: United States v. Moshe Berger**  
**24 Cr. 172 (RA)**

SO ORDERED.

  
Ronnie Abrams, U.S.D.J.  
January 24, 2025

Dear Judge

As This Honorable Court may be aware, I represent Moshe Berger, Defendant in the above referenced matter. Mr. Berger is currently under the supervision of pretrial services and is under house arrest with his primary residence being 9 Hillel Court, Monsey, New York. Since my retention in this matter, I have been in constant communication with AUSA James Mandilk as well as Pretrial Officer Andrew Abbott with regard to the modification of Mr. Berger's current bail conditions. Mr. Abbott has indicated that he would be very comfortable with modifying the Defendant's current bail conditions from home monitoring to stand alone GPS monitoring with the removal of the requirement that he must reside in Monsey, New York.

I spoke with AUSA Mandilk and he has indicated that the Government will defer to pretrial services and will not object to the modification sought herein.

Of note, Mr. Berger's currently resides with his cousin, Mr. Goldstein at the above mentioned location. However, due to a familial falling out, Mr. Berger needs to move out. His intended permanent address will be at Congregation Brashov located at 92 Wallabout Street, Brooklyn, New York. This address has been approved by both the Government as well as well as pretrial services. Furthermore, the fact that this new address is in Brooklyn, New York makes the accidental encounters with the victims much less likely to occur. Therefore, it is respectfully requested that This Honorable Court grant the within application for modification of Mr. Berger's bail conditions.

Additionally, as This Honorable Court is aware, prior counsel submitted an application for deferred prosecution in this matter. It is my understanding that the Government is still reviewing said application and will likely need additional time to do so. We are due to appear in Court on February 13, 2025. AUSA Mandilk has indicated that the Government will not be able to take a position with respect to the Deferred Prosecution application at that time. Therefore, it is respectfully requested that the matter be adjourned for an additional sixty (60) days.

Thank you for your courtesies in advance.

Respectfully yours,

/s/ Hanna H. Shoshany  
Hanna H. Shoshany, Esq.